



July 31, 2023

**VIA ECF**

Hon. Valerie Figueredo  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re. *Gref v. Am. Int'l Indus. et al.*, 20-cv-05589**

Dear Judge Figueredo,

Plaintiff writes in accord with the Court's request for an update on the status of discovery. The only party that has objected to the filing of this status update is Defendant A-I-I.

Since such time that the parties last updated the Court, Plaintiff is pleased to report that his expert(s)' analysis of the contents of the newly discovered bottle of Clubman talc has just recently been completed. A-I-I's expert's testing remains ongoing. Additionally, counsel have conferred regarding the date by which Plaintiff will be supplementing his expert reports/disclosures in accordance with the Federal Rules of Civil Procedure. Plaintiff's deadline to supplement his disclosures will be on Friday, August 4, by agreement of the parties, following which Defendants have advised that they will file any responsive briefings, if needed. Plaintiff intends to provide deposition dates upon request should any Defendants wish to depose Plaintiff's experts on any new opinions.

This letter also informs that Court that Dr. Feingold's deposition remains a source of dispute. More specifically, A-I-I has stated the deposition is deferred until receipt of Plaintiff's proposed supplemental disclosures relating to Dr. Moline, and that Dr. Feingold's deposition will not move forward until resolution of the issues relative Dr. Moline. Plaintiff disagrees with A-I-I's position as addressed in Plaintiff's pending motion for sanctions against A-I-I. Defendant, Colgate-Palmolive Company as a successor- in-interest to The Mennen Company, has advised that it will provide new dates for its expert, Dr. Diette, following Plaintiff's supplemental disclosures, following resolution of the issues related to Dr. Moline, as addressed at the July 6, 2023 hearing.

Counsel will continue to work together in their efforts to reach agreement concerning pre-trial issues and stand ready to answer any questions the Court may have.

Respectfully yours,

James M. Kramer

cc: All Counsel of Record (via ECF)

*We stand for our clients.*

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